CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

During this program year the City of Scottsdale opened a Temporary Homless Hotel and assisted 29 individuals providing overnight shelter acheiving 120% of its expected goal. In addition the through City Collaboration between government, non-profit and faith based organizations opened a Day Relief Center providing mobile shower facilities, and supportive sservices to 86 unduplicated homlesss persons during the coronavirus pandemic and presently meeting the goals of the substantial amendment to PY2019/20 CV funding.

Affordable Rental Movement (ARM) of Save the Family Foundation Inc. has acquired 1 property, per their contract 2019-047-COS. ARM of Save the Family is currently assisting 1 property through the rehabilitation process.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

| Goal | Category | Source | Indicator | Unit of | Expected | Actual – | Percent | Expected | Actual – | Percent |
|------------|------------|--------|-------------------|-----------|-----------|-----------|----------|----------|----------|----------|
| | | 1 | | Measure | _ | Strategic | Complete | _ | Program | Complete |
| | | Amount | | | Strategic | Plan | | Program | Year | |
| | | | | | Plan | | | Year | | |
| Affordable | Affordable | CDBG: | Homoowner Housing | Household | | | | | | |
| Housing | | CDBG. | Homeowner Housing | Housing | 300 | 33 | 11 000/ | 60 | 33 | FF 000/ |
| Objective | Housing | ۶ | Rehabilitated | Unit | | | 11.00% | | | 55.00% |

| Public Facility and Infrastructure Objective | | CDBG: | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 7500 | 7405 | 98.73% | 4280 | 0 | 0.00% |
|---|---|-------|---|---------------------|------|------|--------|------|-----|---------|
| Public Service Objective | Non-Housing Community Development | CDBG: | Public service activities other than Low/Moderate Income Housing Benefit | Persons Assisted | 1800 | 793 | 44.06% | 181 | 793 | 438.12% |
| Public Service Objective | Non-Housing Community Development | CDBG: | Homeless Person Overnight Shelter | Persons Assisted | 1800 | 494 | 27.44% | 24 | 29 | 120.83% |
| Public Service Objective | Non-Housing Community Development | CDBG: | Overnight/Emergency Shelter/Transitional Housing Beds added | Beds | 0 | 0 | | 0 | 0 | |
| Support Program Administration | Non-Housing Community Development | CDBG: | Other | Other | 5 | 0 | 0.00% | 1 | 1 | 100.00% |

Table 1 - Accomplishments - Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The target populations identified in the City of Scottsdale's Consolidated Plan include seniors, persons with disabilities, families with children and youth under 19, victims of domestic violence, adults in crisis, and persons experiencing homelessness. The City of Scottsdale awarded CDBG funds for public services, emergency and transitional housing, housing rehabilitation programs and public facility improvements. Public Service activities funded include crisis and emergency shelter for adults and families, case management for homeless and victims of domestic violence, youth mentoring and development, employment services and services for special needs. Non-public services activities funded include,

emergency home repair, roof repair, green housing rehabilitation and improvements to public / community facilities.

Specific CDBG-funded activities that address the five-year consolidated plan include:

Public Services and Homelessness (793 persons served)

- Provided mentorship, increased self-esteem, scholastic competency, and improved relationships with their families and peers to 36 Scottsdale youth.
- Provided housing navigation and case management services to 40 to low-moderate income Scottsdale residents.
- Provided homeless shelter bed nights to 465 Scottsdale families with children and 29 identified homless individuals on the streets during the coronavirus pandemic.
- Provided bed nights, meals, and independent life skills, parenting and health and wellness training to 39 Scottsdale youth girls between 12 and 18.
- Provided case management and employment services to 38 Scottsdale families.
- Provided case coordination for 37 Scottsdale residents with long-term shelter, rapid rehousing and supportive services.
- Provided employment services to 23 Scottsdale residents with developmental disabilities.
- Provided shower facilities and homeless supportive services to 86 Scootsdale residents.

Public Community and Facilities: (LMA Actual Persons Assisted 7,405)

• Replaced the existing splash pad at Paiute Park, with a new low maintenance splash pad. Work included a new concrete base with a retaining wall and new spray fixtures. A shade structe and benches were also provided as part of the improvement project over the

splashpad.

Housing Repair and Rehabilitation: (33 persons assisted)

- Assisted 5 Homeowners through the Green Rehabilitation Program
- Assisted 5 Homeowners with Roof Repair and Replacement.
- Assisted 23 Homeowners with Emergency Repairs.

The annual goals and outcomes during this reporting period were impacted by the COVID-19 pandemic. Numerous applicants for our Housing Rehabilitation Programs chose to withdraw their applications or not apply for assistance at all due to the pandemic. The pandemic has also affected the supply chain, causing major delays or unavailability of construction materials. Additionally, the Community Assistance Office recently experienced significant staff turnover to its Community Development team, losing our Community Development Supervisor and several other key team members. A new Community Development Supervisor is in place and a staff re-alignment has been performed, but the transition period did significantly affect our outcomes this reporting period.

Housing Development and Construction: (1 home)

ARM of Save the Family has currently acquired 1 property, per their contract 2019-047-COS. ARM of Save the Family is currently assisting 1 property through the rehabilitation process.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

| | CDBG |
|---|------|
| White | 346 |
| Black or African American | 305 |
| Asian | 0 |
| American Indian or American Native | 84 |
| Native Hawaiian or Other Pacific Islander | 0 |
| Total | 735 |
| Hispanic | 129 |
| Not Hispanic | 606 |

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

During FY 2020/21, Scottsdale serviced a total of 735 individuals with CDBG funds. As the above table shows, the percentage of White households assisted in Scottsdale was 47 percent compared to 53 percent to minority households. Hispanic families accounted for 18 percent of the total number of families assisted. The additional persons assisted are identified as other races and ethnicities.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

| Source of Funds | Source | Resources Made Available | Amount Expended During Program Year |
|-----------------|------------------|-----------------------------|-------------------------------------|
| CDBG | public - federal | 1,398,099 | 938,913 |

Table 3 - Resources Made Available

Narrative

A total of \$1,398,099 in CDBG funds were available for the 2020/21 Program Year. The City received \$1,205, 605 allocation from HUD, and \$192,492 re-programmed funds and and program income for 2020/21. Funds received as program income were returned to the City's CDBG line of credit and will be included in the annual funding process for FY 2020/21. Funds were allocated to each of the agencies awarded for public service and non-public service facility improvement activities. A total of \$343,555 was allocated for HOME through Maricopa County HOME Consortium for the acquisition and rehabilitation of property. Additionally, the City of Scottsdale received its CDBG -Coronavirus Aid, Relief, and Economic Security Act (CARES) initial funding allocation of \$709,218.

The City of Scottsdale administered several programs in the FY 2020/21 program year, which includes Public Service activities funded include crisis and emergency shelter for adults and families, case management for homeless and victims of domestic violence, youth mentoring and development, employment services and services for special needs. Non-public services activities funded include regional shelter improvements, emergency home repair, roof repair, green housing rehabilitation and improvements to public/community facilities.

Identify the geographic distribution and location of investments

| Target Area | Planned Percentage of Allocation | Actual Percentage of Allocation | Narrative Description |
|---------------|--|---------------------------------|-------------------------------------|
| CDBG Eligible | | | Areas for area benefit through CDBG |
| Block Groups | 15 | | Program. |
| | | | Areas for individual benefit and |
| Citywide | 85 | | program administration. |

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Scottsdale consists of 184.5 square miles and shares boundaries with the Cities of Tempe and Phoenix, Towns of Cave Creek, Carefree and the Village of Paradise Valley and the Salt River Pima Maricopa Indian Community.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City of Scottsdale utilizes federal CDBG, HOME, and Housing Choice Voucher Programs to assist low-income persons. On a local level, Scottsdale allocates General Funds for brokerage services, domestic violence shelter services, legal services, regional shelter services and senior services. The City also allocates Endowment funds for community projects and youth programs. In addition, the City allocates Scottsdale Cares funds to promote positive development and self-sufficiency, and address crisis needs. Scottsdale Cares is a utility bill donation program that allows residents to donate \$1 on every utility bill to be allocated to social service agencies. Salt River Pima-Maricopa Indian Community (SRPMIC) Funds support regional shelter services, congregate meal programs for seniors and home delivered meals for seniors in the community.

Non-federal resources allocated:

- \$200,000 City of Scottsdale General Fund
- \$160,000 Scottsdale Cares Fund
- \$3,171 Endowment Fund
- \$258,018 SRPMIC

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

| | One-Year Goal | Actual |
|--|---------------|--------|
| Number of Homeless households to be | | |
| provided affordable housing units | 0 | 0 |
| Number of Non-Homeless households to be | | |
| provided affordable housing units | 0 | 0 |
| Number of Special-Needs households to be | | |
| provided affordable housing units | 0 | 0 |
| Total | 0 | 0 |

Table 5 - Number of Households

| | One-Year Goal | Actual |
|--|---------------|--------|
| Number of households supported through | | |
| Rental Assistance | 755 | 596 |
| Number of households supported through | | |
| The Production of New Units | 0 | 0 |
| Number of households supported through | | |
| Rehab of Existing Units | 0 | 0 |
| Number of households supported through | | |
| Acquisition of Existing Units | 0 | 0 |
| Total | 755 | 596 |

Table 6 - Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Discuss how these outcomes will impact future annual action plans.

Include the number of extremely low-income, low-income, and moderate-income persons

served by each activity where information on income by family size is required to determine the eligibility of the activity.

| Number of Households Served | CDBG Actual | HOME Actual |
|-----------------------------|-------------|-------------|
| Extremely Low-income | 0 | 0 |
| Low-income | 0 | 0 |
| Moderate-income | 0 | 0 |
| Total | 0 | 0 |

Table 7 – Number of Households Served

Narrative Information

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The following are resources and supportive services that help address reacing out to homeless persons (especially unsheltered persons) and assessing their individual needs:

CDBG - \$33,000, Family Promise-Greater Phoenix's Emergency Shelter Program, provided assistance to 465 individuals.

CDBG - \$21,600, Save the Family's Case Management and Adult Services, provided assistance to 40 individuals.

CDBG CV1- \$92,684, City of Scottsdale, Day Relief Center, provided assistance to 86 individuals.

CDBG-CV1-\$427,749, City of Scottsdale Temporary Homeless Hotel, provided assistance to 29 individuals.

Scottsdale Cares- \$24,000, Community Bridges Inc. Community Outreach and Crisis Stablization provide assistance to 444 individuals.

Scottsdale Cares - \$20,000, Family Promise's Emergency Shelter Program, provided assistance to 430 individuals.

General Funds - \$40,000, Family Promise's Emergency Shelter, provided assistance to 430 individuals.

General Funds - \$40,000, Catholic Charities My Sister's Place, provided assistance to 7 women.

SRPMIC - \$50,000, Central Arizona Shelter Services (CASS) provided assistance to 32 individuals.

SRPMIC – \$25,000, UMOM New Day Centers, Inc. Regional Shleter Services, provided assistance to 40 individuals.

SRPMIC – \$40,000, A New Leaf, Inc East Valley Men's Center, provided assistance to 11 individuals.

Addressing the emergency shelter and transitional housing needs of homeless persons

The following are resources and supportive services that help address the emergency shelter and

transitional housing services:

CDBG - \$25,000, Florence Crittenton's Transitional Housing, provided assistance to 39 girls.

CDBG - \$13,230, Homeward Bound's Case Management & Supported Services, provided assistance to 38 individuals and their children.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City of Scottsdale provides funding assistance and licensee agreements to non-profit providers of services to Scottsdale's youth, seniors, special needs populations, victims of domestic violence, persons and families in crisis, and disabled persons. The City improves the quality of life through connecting people to services, providing access to basic needs, providing prevention assistance through intake and referral, emergency rent and mortgage assistance and emergency utility assistance.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City of Scottsdale allocates local and federal funding to some facilities outside of Scottsdale where the need is regional and the share of Scottsdale's investment is less than or equal to Scottsdale's proportional share of the regional population. The City participates in and supports the regional Continuum of Care efforts to serve the homeless through financial support to facilities including Domestic Violence Shelter, Regional Shelter Services and Transitional Housing Services. During FY 20/21 the City of Scottsdale allocated \$567,374 of its CDBG -CV 1 funds to assist chronically homeless individuals through a temporary homeless hotel and the creation of the Day Relief Centers through a City led collaborative effort between government, faith-based and non-profit services.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

N/A. The City of Scottsdale does not have public housing.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

N/A. The City of Scottsdale does not have public housing.

Actions taken to provide assistance to troubled PHAs

N/A. The City of Scottsdale does not have public housing.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

Affordable housing development can be impeded by a variety of factors including zoning and land use policy, permitting and approval of housing development, property taxes, local building codes and development and infrastructure costs. The City has identified three primary barriers to affordable housing:

- Current market conditions such as increased land costs, high construction costs, construction liabilities and lack of developable land constrain the housing market and become barriers to affordable housing;
- Financing requirements, increasing interest rates and lending discrimination make homeownership less attainable for low and moderate income households; and
- Regulatory/policy measures such as development fees, building codes, zoning, and the approval process create obstacles to developing affordable housing. Although the ability to eliminate, or even mitigate, some of these barriers is limited, the City continues to do the following:
- Preserve and improve existing housing stock through Housing Rehabilitation;
- Leverage HOME funds for acquisition and rehabilitation; and
- Ensure equal access to housing by providing resources to educate and address fair housing and landlord/tenant disputes.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City of Scottsdale took the following actions to address obstacles to meeting underserved needs including:

- Increased levels of code enforcement to preserve neighborhoods
- Funded programs offering rehabilitation to preserve older housing stock
- Funded non-profit agencies to provide programs and services to the elderly and frail elderly
- Increased services for basic needs
- Continued to target capital improvements including but not limited to:
 - Neighborhood oriented public improvements

The City of Scottsdale continued to provide services to the community, including but not limited to:

- Homeowner-occupied Housing Rehabilitation, Roof Repair and Replacement and Emergency Repair Programs for low-comcome households
- Family Self-Sufficiency Program
- Subsidized Rental assistance (Section 8 Housing Choice Voucher Program)
- Tax counseling assistance at Senior Centers
- Emergency rent and utility assistance through Vista Del Camino

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The following measures were taken by the City of Scottsdale to inform residents about the hazards of lead-based paint, and to ensure HUD-funded housing rehabilitation projects effectively address lead paint hazards:

- In an effort to educate citizens about lead-based paint hazards, the City distributed a copy of the Environmental Protection Agency (EPA) brochure The Lead-Safe Certified Guide to Renovate Right to all applicants assisted through the City's Housing Rehabilitation Programs. Applicants must sign a receipt acknowledging receipt of this brochure.
- In all housing rehabilitation activities, lead-hazards are identified through an independent Risk

 Assessment at no cost to the homeowner. The assessment firm determines all areas where lead is

 present and provides a Lead-Based Paint Risk Assessment Report to the City. The report is then used to

 help the Housing Rehabilitation Coordinator determine what aspects of the housing rehabilitation

 project require lead paint safe work practices.
- A copy of the Lead-Based Paint Risk Assessment Report is given to the property owner, and the property owner must sign a receipt for the report. The Housing Rehabilitation Coordinator reviews the Lead-Based Paint Risk Assessment Report with the property owner to ensure they understand the information provided in the report, and acknowledge the identified components containing lead-based paint.

- Lead-based paint work is closely monitored by the Housing Rehabilitation Coordinator throughout the
 project to make certain items are correctly addressed per the specifications and in the least amount of
 time to avoid disruption to the household.
- In compliance with the Housing Rehabilitation Program's Relocation Policy, a property owner may be eligible for temporary relocation accommodations when the rehabilitation project requires the disturbance of materials containing lead-based paint.
- Upon completion of lead reduction work, a clearance test is conducted at the property by the assessment firm; a lead-based paint clearance test is completed to document that lead hazards were mitigated. If a contractor fails a clearance test, the expense of a second clearance test is borne entirely by the contractor.

The City of Scottsdale continues to test homes constructed prior to 1978 for lead-based paint in compliance with 24 CFR part 35. All pre-1978 homes that receive assistance through the Housing Rehabilitation Programs are tested and abated if applicable. The cost associated with lead-based paint remediation continues to increase the total cost of housing rehabilitation projects. In order to keep the costs of lead-based paint testing from adding directly to the cost of each housing rehabilitation project, the City pays for lead-based paint risk assessments and corresponding clearance tests at no cost to the property owner's project.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The City of Scottsdale took the following actions to reduce the number of families in poverty including:

- Intake and case management
- Food boxes
- Utility assistance
- Emergency mortgage and rent assistance

Long term strategies are provided through the Housing Choice Voucher Family Self-Sufficiency Program, the Vista Job Prep Program and case management and employment services that are provided by non-

profit organizations.

Local non-profits including A New Leaf, Central Arizona Shelter Services (CASS), Chrysalis Shelter for Victims of Domestic Violence, Homeward Bound, Family Promise of Greater Phoenix, Save the Family Foundation of Arizona and Florence Crittenton help stabilize households through emergency and transitional housing. These emergency and transitional housing services are also accompanied by supportive resources and employment services.

The Housing Choice Voucher Family Self-Sufficiency Program combines the resources of case management with career counseling and job coaching with longer term assistance through Section 8 Rental assistance to achieve economic independence. Family Self-Sufficiency also includes opportunities for further education, financial literacy, establishing Individual Development Accounts, Individual Development Empowerment Accounts and multiple forms of homeownership assistance with the results that some graduates become self-sufficient homeowners in the Community.

The City of Scottsdale also actively markets the Earned Income Tax credit to its citizens. Two City facilities, Via Linda Senior Center and Granite Reef Senior Center, provided space and resources for AARP to provide free tax preparation.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City of Scottsdale furthers delivery system for housing and community development including:

- o Homeownership
- o Housing Rehabilitation Programs
- o Housing Choice Voucher Program (rental assistance)
- o Family Self-Sufficiency Program

Development of other community resources is ongoing and will continue to include regional cooperation in:

- o The Maricopa HOME Consortium
- o The MAG Continuum of Care Committee on Homelessness and
- o The East Valley Needs Assessment / Community Health Needs Assessment

Local initiatives, including:

- o Brokerage licenses to non-profit service providers in City facilities
- o The Scottsdale Cares utility donation program
- o General Fund allocations to regional homeless facilities
- o Salt River Pima-Maricopa Indian Community Funds
- o Endowment Fund allocations for community projects and programs for the public good

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City of Scottsdale took the following actions to enhance coordination between public and private housing and social service agencies in FY2020/21:

- Provided funding assistance and licensee agreements to non-profit providers of services to Scottsdale's youth, seniors, special needs populations, victims of domestic violence, persons and families in crisis, and disabled persons
- Addressd increased needs through best practices in management of programs, funding, facilities, and license agreements
- Improved quality of life through connectivity-people to services
- Provided access to basic need
- Collaboration with other governmental agencies, social service providers and faith-based organizations to address the needs of the homeless population during the coronavirus pandemic.

Provided prevention assistance through:

- Intake and Referral
- Emergency rent and mortgage assistance
- Emergency utility assistance
- Promote self-sufficiency, mitigate the causes of poverty and support independent living through the Family Self-Sufficiency Program (FSS)
- Improve quality of life through education, recreation and socilization

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The following actions were taken to address identified impediments:

- Maintained a Fair Housing page on the City's web page
- Maintained a direct link from the City's webpage to the HUD Fair Housing website
- Participated as a member of the Arizona Fair Housing Partnership and sponsoring events with the Partnership
- Maintaining a call log for Fair Housing complaints and referrals
- Making Fair Housing referrals to the Arizona Attorney General's Office, Southwest Fair Housing Council, HUD and other enforcement entities
- Displaying Fair Housing posters in public buildings and at Fair Housing functions
- Purchasing and distributing Fair Housing marketing materials
- Included the Fair Housing logo on business cards, local brochures and marketing information

- Monitoring grant funded sub-recipients for compliance with Fair Housing and affirmative marketing requirements
- Providing Community Assistance Office staff opportunities to receive education in Fair Housing, reasonable accommodations and equal opportunity best practices and laws
- Intervened, educated and made referrals to landlords who fail to understand equal opportunity and fair housing regulations

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Monitoring is an on-going process of review to ensure compliance with all applicable federal regulations and policies. Planning, implementation, communication, during each phase of the activities are effective tools for improving performance and avoiding non-compliance. The typical phases of an activity include the initial allocation, written agreements monthly progress/performance reports, monthly demographic reports, request of expenditure reimbursements, and closing reports.

Forms of Monitoring:

- Review reports, audits, and management letters at the time of application
- Review of Federal requirements during contract signing
- Review of periodic reimbursement requests and periodic performance reports
- Technical Assistance (meetings, telephone calls, site visits, written correspondence, etc.)
- Desk reviews (in-house reviews of documentation submitted to the reviewer, program files, and financial records)
- On-site reviews (reviewing program files and financial records)

Risk Assessment:

The level of monitoring to be conducted is determined by a risk analysis assigned to the entity. Entities receiving CDBG/HOME funds will be evaluated annually to determine the appropriate risk classification. Entities deemed to be "low risk" will be subject to desk review. Entities deemed to be "high risk" will be subject to an on-site monitoring review.

To be classified as "low-risk", an entity must generally meet the following criteria:

- An on-site visit has been conducted within the last two years
- There has been insignificant or no compliance or performance problems noted

To be classified as "high-risk", an entity may meet one or more of the following risk factors:

- An on-site visit has not been conducted within the last two years
- The entity is new to the CDBG or HOME Program

- There has been a high rate of employee turnover or turnover in key staff positions
- There has been noncompliance with one or more contract provisions
- There were significant findings and/or concerns noted in previous desk reviews or on-site monitoring visits
- There are significant unresolved audit findings
- There has been a high incidence of citizen or vendor complaints
- Reimbursement requests or performance reports contain inaccurate information
- There is a demonstrated need for on-going technical assistance. Please note the risk designations are not limited to the above-stated conditions and may be assigned due to other circumstances. Public agencies are monitored every other year. Housing-related agencies are monitored annually

Due to the coronavirus pandemic, social distancing requirements, and experiencing significant staff turnover during PY20/21 the ability to monitor performance was significantly impacted. During the PY 21/22 monitoring will be addressed for previous and current years funds.

Minority Business Outreach:

The City of Scottsdale Community Assistance Officeis initiating program guidelines as a compliance tool for meeting its Federal Grant Program requirements mandated in the regulatory rules and is not intended to supersede, replace or impose an unfair or un-equal advantage of M/WBE's to the detrimenet of others. These program guideness will meet Federal program requirementsd, establish a "good faith effort" with CDBG, HOME and other Department of HUD funded programs and aid and assist in creating and sustaining economic and community revilitatilization activity by providing "Equal Opporttunity" to complete for contract opportunities.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The CAPER was made available to the public for review electronically on the City's Website at https://www.scottsdaleaz.gov/human-services/cdbg-home and located at the Community Assistance Office at 6535 E. Osborn Road Bldg. 8 for review and comment.

The City of Scottsdale conducted a 15-day public comment period and public hearing for the CAPER.

For Program Year 2020-2021, the public comment period began September 14, 2021 and closed on September 30, 2021. A public meeting was held on Thursday, September 9, 2021 at the Human Services Commission meeting providing a comprehensive presentation on the outcomes of the CDBG and HOME funding. In addition to commenting at the meeting meeting, citizens were invited to submit written comments to the Community Development Supervisor at mwitkofski@scottsdaleaz.gov.

The public meeting was announced through a public agenda notification. The comment period was announced through an advertisement in the Arizona Republic, a local newspaper in circulation, and was posted in public locations such as the Community Assistance Office and on the City's website. The public meeting included the meeting, date, time and topics to be considered.

All public comments reveived during the public comment period will become part of the permanent record.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.